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September 21, 2011

Honorable Alvin K. Hellerstein
United States District Court for the Southern District of New York
500 Pearl Street
New York, New York 10007

Re: 21MC102/103 (AKH) Application for relief re database: signature and/or signature under oath

Dear Judge Hellerstein:

The instant application is on behalf of a limited number of this firm's clients seeking limited relief from the Order, Amending Summary Order, August 2, 2011 Conference, filed August 29, 2011, (annexed for reference). Pursuant to that Order, the parties were required to formulate and populate a database to assist the limited case selection process for advancement to trial. The database was to be signed by the plaintiffs under oath.

After many meetings between the Plaintiff and Defense Liaison with the Special Masters, the database fields were first finalized and approved in the last several weeks. To complete the database we have reviewed our files, analyzed data and for the majority of our clients, to the extent possible, conducted individual conferences. By direction of the Special Masters, Plaintiffs were to populate their databases and forward the information to TCDI for uploading by September 22, 2011. **The database has been sent to TCDI for all of our clients in advance of that deadline.** All databases certified and signed by the client under oath with the follow exceptions:

On the following two pages, we have provided the specifics for individuals whose database is either without signature (List 1), or with signature but not notarized (List 2).

List 1 references plaintiffs whose database is without signature, the reason for same as indicated for each plaintiff, as well as the relief requested

List 2 references plaintiffs who are abroad, and who have reviewed, signed and certified their database as accurate, although they are without notary. In many foreign countries, it is a costly and arduous task to have such documents notarized. In some instances the documents must first be translated, and then reviewed by a local attorney. In other instances, individuals would have to travel to a US Embassy to have the documents notarized. The relief requested is indicated.

Thank you for your kind attention to this request.

Respectfully,

s/

Gregory Cannata

s/

Robert Grochow

List 1 (Database filed but without signature) Cannata/Grochow

To date, we have been unable to obtain the signature of the following plaintiffs for the reasons stated.

RELIEF REQUESTED: For those plaintiffs listed below who are abroad and not currently expected to return to the United States in the immediate future*, we request the Court to forego the notarization requirement, accept a signed certification without notary as sufficient, and to grant a minimum 30 day extension to obtain such certification. If the Court requires a notarized signature for those plaintiffs who are abroad, and in all instances, we request a minimum 30 day extension. For those plaintiffs listed below in the United States or whose return to the United States is imminent**, we request a minimum 30 day extension to obtain their signature under notary. For those clients whom we are currently unable to contact***, we request a minimum 45 day extension.

<i>Case Number</i>	<i>Docket</i>	<i>Last Name</i>	<i>First Name</i>	<i>Basis for application</i>
07CV1478	21MC102	Campuzano	Joaquin	*Mr. Campuzano is in Ecuador; We anticipate receiving the signed certification shortly, <i>although it will not be notarized</i>
06CV5337	21MC102	Ginter	Janusz	**Mr. Ginter will be signing under notary within the next several days
06CV1521	21MC102	Kowalewski	Tadeusz	***We are temporarily unable to contact Mr. Kowalewski. Our efforts to contact this client continue.
06CV1513	21MC102	Mierzejewski	Ireneusz	**Mr. Mierzejewski is traveling back to New York from Europe and is expected in our office to sign under notary in the next several days
10CV6868	21MC102	Retelski	Marian	*Mr. Retelski is currently on vacation in Europe. We are trying to locate him in Europe. If successful, we will obtain signature <i>however without a notary</i> ; alternatively, if he returns to New York, he will come to office to sign under notary.
09CV2259	21MC102	Sanchez	Freddy	***We have been unable to reach Mr. Sanchez; our efforts to reach this client are continuing
09CV0680	21MC102	Socha	Marek	***Mr. Socha has not been available to this office; however we anticipate his signature under notary within the next several weeks.
05CV2446	21MC102	Sowa	Mieczyslaw	***We are temporarily unable to reach to contact Mr. Mieczyslaw. Our efforts to contact this client continue.
06CV5336	21MC102	Szalaj	Zbyszek	**Mr. Szalaj is in Europe but expected to return to New York and come in to office to sign under notary within the week.
07CV11293	21MC102	Szymik	Henryk	***We are temporarily unable to contact this Mr. Szymik. Our efforts to contact this client continue.

List 2 (Database filed and signed, but without notary) Cannata/Grochow

For the following plaintiffs, although their database is under signature and certified as accurate such signature is without notary due to hardship in obtaining a notary in a foreign country as referenced above in this application.

RELIEF REQUESTED: For the following plaintiffs, all of whom are abroad, we request the Court to accept the already signed certification as sufficient and forego the notarization requirement. If the Court requires a notarized signature, we request a minimum 30 day extension.

<i>Case Number</i>	<i>Docket</i>	<i>Last Name</i>	<i>First Name</i>
05CV6240	21MC102	Cieslak	Romuald
08CV9065	21MC102	Dul	Alojzy
05CV3090	21MC102	Foremska	Lucyna
08CV9067	21MC102	Galazka	Jadwiga
08CV6722	21MC102	Galazka	Josef(Fall)
06CV5343	21MC103	Galazka	Jozef
06CV5289	21MC102	Jastrzebowski	Eugeniusz
10CV6882	21MC103	Kowalewski	Janusz
08CV6804	21MC102	Krysiuk	Ryszard
10CV6864	21MC102	Ouglyk	Jaroslav
05CV6269	21MC102	Wajda	Andrej
09CV2258	21MC102	Zdanowicz	Jan